

**CERTIFICATE OF COMPLIANCE**

I hereby certify that the accompanying Brief of Public Policy Research Organizations and Advocacy Groups as *Amici Curiae* in Support of Petitioner in Thompson v. Marietta Education Association, et al., No. 20-1019 complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 3,868 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).

A handwritten signature in black ink, appearing to read "Erik S. Jaffe", is written above a horizontal line.

Erik S. Jaffe